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November 25, 2020

VIA ECF

Honorable Freda L. Wolfson, Chief Judge
United States District Court- District of NJ
Clarkson S. Fisher Building & U.S. Courthouse
402 East State Street, Court Room 5E
Trenton, NJ 08608

**Re: *In re: Johnson & Johnson Talcum Powder Products Marketing,
Sales Practices and Products Liability Litigation - MDL 2738***

Dear Chief Judge Wolfson:

Please accept this letter in support of defendants Johnson & Johnson and Johnson & Johnson Consumer Inc.'s Motion to Dismiss for failure to comply with the Court's October 13, 2020 Order directing filing of amended complaints by October 20, 2020.

As of this filing, the six plaintiffs listed in attached Exhibit A have failed to comply with the October 13 Order requiring them to file amended complaints within seven days, by October 20, 2020. See October 13, 2020 Order, Exhibit A. Pursuant to Rule 41(b), "If the plaintiff fails to prosecute or to comply with these rules or a court order, a defendant may move to dismiss the action or any claim against it." All of these cases have been pending for almost two years or longer, and plaintiffs have offered no reason for their refusal to comply with the October 13 Order. Defendants therefore respectfully request that plaintiffs' cases be dismissed with prejudice pursuant to Rule 41(b).

Honorable Freda L. Wolfson,
Chief Judge

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November 25, 2020

Thank you for your consideration of this matter.

Respectfully submitted,

/s/ Susan M. Sharko

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*Attorneys for Defendants Johnson &
Johnson and Johnson & Johnson
Consumer Inc.*

cc: All Counsel of Record (via ECF)

Honorable Freda L. Wolfson,
Chief Judge

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November 25, 2020

EXHIBIT A

MDL Case No.	Plaintiff Name	Law Firm Name
3:17-cv-09127	Ellis, Paula	The Law Offices of Sean M. Cleary
3:18-cv-15782	Green, Catherine	Girardi & Keese
3:18-cv-08463	Herrmann, Linda	Simmons Hanly Conroy
3:19-cv-08359	Lagle, Sylvia	Heninger Garrison Davis
3:18-cv-12309	Richard, Donna	Marlin & Saltzman LLP
3:17-cv-06984	Smith, Sarah	Barrett Law Group